

Local Authority:	Bracknell Forest Borough Council
Reference:	ASR-0169
Date of issue	November 2019

Annual Status Report Appraisal Report

The Report sets out the Annual Status Report, which forms part of the Review & Assessment process required under the Environment Act 1995 and subsequent Regulations.

Bracknell Forest Borough Council have declared 2 Air Quality Management Areas (AQMAs) across the district: Bracknell and Crowthorne.

Automatic monitoring was undertaken at 1 site within the borough during 2018, Downshire Way, having closed the Foxhill School site at the end of 2017. The annual mean NO₂ concentration at Downshire Way met the objective. Data capture during 2018 was good.

Non-automatic (passive) monitoring of NO₂ was conducted at 42 sites during 2018. Four exceedances of the annual mean objective were measured, however following distance correction to the nearest relevant exposure this was reduced to zero exceedances. Data capture was below 75% at two sites, with data capture good at all other monitoring locations.

QA/QC procedures have been applied with a local bias adjustment factor used. Distance corrections were conducted for sites not representative of relevant exposure, however, calculations were not provided, and the distance-corrected concentrations were incorrectly reported in Table A.2. In future concentrations should not be distance-corrected in Table A.2. Annualisation was carried out for one of the two sites with data capture <75% but not for the other. In future all sites with data capture <75% should be annualised. The report provides maps of each monitoring site and a breakdown of historical trend data.

There is detailed discussion of the measures taken during 2018 to tackle air quality. Priorities for the next reporting year are clearly outlined. It is noted that the Air Quality Action Plan of 2014 will become out of date next year. No reference is made in the 2019 ASR of plans to update it.

On the basis of the evidence provided by the local authority the conclusions reached are acceptable for all sources and pollutants. Following the completion of this report, Bracknell Forest Borough Council should submit an Annual Status Report in 2020.

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Commentary

The report is well structured, detailed, and provides the information specified in the Guidance. The following comments are designed to help inform future reports.

1. Trends are clearly presented and discussed and a robust comparison with air quality objectives is provided.
2. The continuing review of NO₂ monitoring locations is supported and any updates should be reported on in the 2020 ASR.
3. In response to last year's appraisal, Site IDs and Site Names are included in the 'Site ID' column. It is considered that readability and ease of cross-reference is maximised by just stating the Site ID alone in this column of Table A.3.
4. The diffusion tube mapping is comprehensive and for the most part, clearly enables the AQMA boundaries and monitoring to be spatially located. However, the maps for the new sites (last three maps) are of a lower resolution than those that precede them and are therefore less clear. The map showing the automatic monitoring also uses a different naming convention than that in the text.
5. The report states that annualisation at one monitoring site (119) was required, and calculations are correctly shown in that instance. However, Table A.3 states that data capture for the year of 66.7% for 85xyz and 58.3% for 121, which should have both therefore also been annualised, as per paragraph 7.124 of LAQM.TG(16), which states this is required with a data capture below 75%. Both are not near to exceeding the objective.
6. Data presented in Table A.3 has been distance corrected. The Council should be aware that this is not the correct method for presenting NO₂ results. As stated by the instruction box in section 3.2.1 within the ASR template, data within Table A.3 are to only be bias adjusted and annualised (where appropriate). Distance corrected results are to only be presented in Table B.1 and discussed where appropriate. It is recommended that the Council adhere to the data presentation method outlined above in future ASRs, particularly as this has had the result that no exceedances are reported, when, under the correct presentation, three exceedances should be reported. As per paragraph 7.78 of LAQM.TG(16), it is also not essential to distance correct all sites that are not at risk of exceedance of the objective, which may save the Council reporting time. Presentation of the distance correction calculator outputs in the appendix would also be welcomed for ease of review.

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7. The report included measures to address PM_{2.5} and links to Public Health outcomes Frameworks. This is encouraged to be continued in future ASRs.
8. There were inconsistencies between Table 2.1 and Table A.3. The data for current maximum concentrations of NO₂ in the AQMAs in Table 2.1 do not appear to correlate with either the data presented in Table A.3 (distance corrected) or Table B.1 (prior to distance correction), particularly for the Crowthorne AQMA.
9. A formatting inconsistency between the Excel sheet and the ASR has resulted in all data for previous years in Table A.3 being bolded, and in the case of 2014, also underlined, instead of just that data that represents exceedances.
10. The national bias adjustment factor has been misquoted in the report as being the same as the local factor. Gradko (20% TEA in water) did not have a bias adjustment factor of 0.84 in the 03/19 issue quoted, it was 0.93. Therefore, whilst the use of the local bias adjustment factor is considered robust, further discussion around the relative merits of local vs. national factors would have been appropriate, given the variation in factors.
11. Attention is drawn to the fact that the 2014 Air Quality Action Plan will become out of date by the next reporting cycle, and so the Council should consider updating this.
12. Overall the report is highly detailed, satisfies the criteria of relevant standards, and is a good source for members of the Public to find out about air quality in their area. The Council should continue their good work and submit an Annual Status Report in 2020.

This commentary is not designed to deal with every aspect of the report. It highlights a number of issues that should help the local authority either in completing the Progress Report adequately (if required) or in carrying out future Review & Assessment work.

Issues specifically related to this appraisal can be followed up by returning the attached comment form to Defra, Welsh Assembly Government, Scottish Government or DOE.

For any other queries please contact the Local Air Quality Management Helpdesk:
 Telephone: 0800 0327 953
 Email: LAQMHelpdesk@uk.bureauveritas.com

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Appraisal Response Comment Form

Contact Name:	
Contact Telephone number:	
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Comments on appraisal/Further information: